

1 DANIEL E. LUNGREN, Attorney General
of the State of California
2 RICHARD D. HENDLIN,
Deputy Attorney General
3 California Department of Justice
110 West A Street, Suite 1100
4 Post Office Box 85266
San Diego, California 92186-5266
5 Telephone: (619) 645-2071
6 Attorneys for Complainant
7

8 **BEFORE THE**
MEDICAL BOARD OF CALIFORNIA
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation)	Case No. 10-92-22793
Against:)	
12)	OAH No. L-9507069
13 LAWRENCE J. JAFFE, M.D.)	
5608 Mill Peak Road)	STIPULATED SETTLEMENT
San Diego, California 92120)	AND
14 Physician's and Surgeon's No.)	DISCIPLINARY ORDER
15 A32274,)	
)	
16 Respondent.)	
)	

17
18 **IT IS HEREBY STIPULATED AND AGREED** by and between the
19 parties to the above-entitled proceedings that the following
20 matters are true:

21 1. An Accusation in case number 10-92-22793 was filed
22 with the Division of Medical Quality, of the Medical Board of
23 California Department of Consumer Affairs (the "Division") on
24 June 6, 1995, and is currently pending against Lawrence J. Jaffe,
25 M.D. (the "respondent").

26 2. The Accusation, together with all statutorily
27 required documents, was duly served on the respondent on or about

1 June 6, 1995, and respondent filed his Notice of Defense
2 contesting the Accusation on or about June 21, 1995. A copy of
3 Accusation No. 10-92-22793 is attached as Exhibit "A" and hereby
4 incorporated by reference as if fully set forth.

5 3. The Complainant, Ron Joseph, is the Executive
6 Director of the Medical Board of California. This action was
7 initially brought by Dixon Arnett, the then Executive Director of
8 the Medical Board of California solely in his official capacity.
9 The Complainant is represented by the Attorney General of
10 California, Daniel E. Lungren, by and through Deputy Attorney
11 General Richard D. Hendlin.

12 4. The respondent is represented in this matter by
13 Monty A. McIntyre, Esq., whose address is 2169 First Avenue, San
14 Diego, California 92101.

15 5. The respondent and his attorney have fully
16 discussed the charges contained in Accusation number 10-92-22793,
17 and the respondent has been fully advised regarding his legal
18 rights and the effects of this stipulation.

19 6. At all times relevant herein, respondent has been
20 licensed by the Medical Board of California under Physician's and
21 Surgeon's Certificate No. A32274.

22 7. Respondent understands the nature of the charges
23 alleged in the Accusation and that, if proven at hearing, the
24 charges and allegations would constitute cause for imposing
25 discipline upon his license. Respondent is fully aware of his
26 right to a hearing on the charges contained in the Accusation,
27 his right to confront and cross-examine witnesses against him,

1 his right to the use of subpoenas to compel the attendance of
2 witnesses and the production of documents in both defense and
3 mitigation of the charges, his right to reconsideration, appeal
4 and any and all other rights accorded by the California
5 Administrative Procedure Act and other applicable laws.
6 Respondent knowingly, voluntarily and irrevocably waives and give
7 up each of these rights.

8 8. Respondent admits the factual allegations in the
9 Accusation No. 10-92-22793 in paragraphs 5B, D, E, F, G, H, I,
10 and J. Respondent further admits those portions of Accusation
11 paragraph 5A that Merry F. was his patient from November of 1986
12 until July of 1993, and admits the portions of Accusation
13 paragraph 5C that he refilled Merry F.'s Klonopin on other
14 occasions without her permission and picked up the prescriptions
15 himself. Respondent does not contest the other factual
16 allegations in Accusation paragraphs 5A and 5C. Respondent
17 acknowledges the other allegations of Accusation No. 10-92-22793,
18 and agrees that he has subjected his license to disciplinary
19 action, and he gives up his right to contest the charges in the
20 Accusation. Respondent agrees to be bound by the Division's
21 Disciplinary Order as set forth below.

22 9. Based on the foregoing admissions and stipulated
23 matters, the parties agree that the Division shall, without
24 further notice or formal proceeding, issue and enter the
25 following order:

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1 designee, and shall successfully complete the course during the
2 first year of probation.

3 4. ORAL CLINICAL OR WRITTEN EXAM Respondent shall take
4 and pass an oral clinical exam in subjects to be designated and
5 administered by the Division, or its designee. This examination
6 shall be taken within ninety (90) days after the effective date
7 of this decision. If respondent fails the first examination,
8 respondent shall be allowed to take and pass a second
9 examination, which may consist of a written as well as an oral
10 examination. The waiting period between the first and second
11 examinations shall be at least three (3) months. If respondent
12 fails to pass the first and second examination, respondent may
13 take a third and final examination after waiting a period of one
14 (1) year. Failure to pass the oral clinical examination within
15 eighteen (18) months after the effective date of this decision
16 shall constitute a violation of probation. The respondent shall
17 pay the costs of these examinations within ninety (90) days of
18 the administration of each exam.

19 If respondent fails the first examination, respondent
20 shall be suspended from the practice of medicine until a repeat
21 examination has been successfully passed, as evidenced by written
22 notice to respondent from the Division or its designee.

23 5. PSYCHIATRIC EVALUATION Within thirty (30) days of
24 the effective date of this decision, and on a periodic basis
25 thereafter as may be required by the Division or its designee,
26 respondent shall undergo a psychiatric evaluation (and
27 psychological testing, if deemed necessary) by a Division-

1 appointed psychiatrist, who shall furnish an evaluation report to
2 the Division or its designee. The respondent shall pay the cost
3 of the psychiatric evaluation.

4 If respondent is required by the Division or its
5 designee to undergo psychiatric treatment, respondent shall
6 within thirty (30) days of the requirement notice submit to the
7 Division for its prior approval the name and qualifications of a
8 psychiatrist of respondent's choice. Respondent shall undergo
9 and continue psychiatric treatment until further notice from the
10 Division or its designee. Respondent shall have the treating
11 psychiatrist submit quarterly status reports to the Division or
12 its designee indicating whether the respondent is capable of
13 practicing medicine safely.

14 If the evaluation or the treating psychiatrist's report
15 determines that respondent is not mentally fit to practice
16 medicine safely, then respondent shall be suspended from the
17 practice of medicine until a repeat evaluation establishes that
18 he can practice safely, as evidenced by written notice to
19 respondent from the Division or its designee.

20 6. MONITORING Within thirty (30) days of the
21 effective date of this decision, respondent shall submit to the
22 Division or its designee for its prior approval a plan of
23 practice in which respondent's practice shall be monitored by
24 another physician in respondent's field of practice, who shall
25 provide periodic reports to the Division or its designee.

26 If the monitor resigns or is no longer available,
27 respondent shall, within fifteen (15) days, move to have a new

1 monitor appointed, through nomination by respondent and approval
2 by the Division or its designee.

3 7. OBEY ALL LAWS Respondent shall obey all federal,
4 state and local laws, all rules governing the practice of
5 medicine in California, and remain in full compliance with any
6 court ordered criminal probation, payments and other orders.

7 8. QUARTERLY REPORTS Respondent shall submit
8 quarterly declarations under penalty of perjury on forms provided
9 by the Division, stating whether there has been compliance with
10 all the conditions of probation.

11 9. PROBATION SURVEILLANCE PROGRAM COMPLIANCE
12 Respondent shall comply with the Division's probation
13 surveillance program. Respondent shall, at all times, keep the
14 Division informed of his addresses of business and residence
15 which shall both serve as addresses of record. Changes of such
16 addresses shall be immediately communicated in writing to the
17 Division. Under no circumstances shall a post office box serve
18 as an address of record.

19 Respondent shall also immediately inform the Division,
20 in writing, of any travel to any areas outside the jurisdiction
21 of California which lasts, or is contemplated to last, more than
22 thirty (30) days.

23 10. INTERVIEW WITH THE DIVISION, ITS DESIGNEE OR ITS
24 DESIGNATED PHYSICIAN(S) Respondent shall appear in person for
25 interviews with the Division, its designee or its designated
26 physician(s) upon request at various intervals and with
27 reasonable notice.

1 11. TOLLING FOR OUT-OF-STATE PRACTICE, RESIDENCE OR IN-STATE
2 NON-PRACTICE In the event respondent should leave California to
3 reside or to practice outside the State or for any reason should
4 respondent stop practicing medicine in California, respondent
5 shall notify the Division or its designee in writing within ten
6 (10) days of the dates of departure and return or the dates of
7 non-practice within California. Non-practice is defined as any
8 period of time exceeding thirty days in which respondent is not
9 engaging in any activities defined in Sections 2051 and 2052 of
10 the Business and Professions Code. All time spent in an
11 intensive training program approved by the Division or its
12 designee shall be considered as time spent in the practice of
13 medicine. Periods of temporary or permanent residence or
14 practice outside California or of non-practice within California,
15 as defined in this condition, will not apply to the reduction of
16 the probationary period.

17 12. COMPLETION OF PROBATION Upon successful completion
18 of probation, respondent's certificate shall be fully restored.

19 13. VIOLATION OF PROBATION If respondent violates
20 probation in any respect, the Division, after giving respondent
21 notice and the opportunity to be heard, may revoke probation and
22 carry out the disciplinary order that was stayed. If an
23 accusation or petition to revoke probation is filed against
24 respondent during probation, the Division shall have continuing
25 jurisdiction until the matter is final, and the period of
26 probation shall be extended until the matter is final.

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1 14. **COST RECOVERY** The respondent is hereby ordered to
2 reimburse the Division for its investigative and prosecution
3 costs in the amount of \$12,000, with the option of making
4 payments of at least \$3,000 within one hundred and eighty (180)
5 days of the effective date of this decision, and \$3,000 during
6 each of the following 3 years due and payable no later than July
7 31. Failure to reimburse the Division's cost of investigation
8 and prosecution shall constitute a violation of the probation
9 order, unless the Division agrees in writing to payment by an
10 installment plan because of financial hardship. The filing of
11 bankruptcy by the respondent shall not relieve the respondent of
12 his responsibility to reimburse the Division for its
13 investigative and prosecution costs.

14 15. **PROBATION COSTS** Respondent shall pay the costs
15 associated with probation monitoring each and every year of
16 probation or on a prorated basis thereof. The costs are
17 currently set at \$2,588 per year, but may be adjusted downward on
18 an annual basis. Such costs shall be payable to the Division of
19 Medical Quality and delivered to the designated probation
20 surveillance monitor by January 10 of each year beginning in 1997
21 and continuing in 1998, 1999, 2000, and 2001. Failure to pay
22 costs within 30 days of the due date shall constitute a violation
23 of probation.

24 16. **LICENSE SURRENDER** Following the effective date of
25 this decision, if respondent ceases practicing due to retirement,
26 health reasons or is otherwise unable to satisfy the terms and
27 conditions of probation, respondent may voluntarily tender his

1 certificate to the Board. The Division reserves the right to
2 evaluate the respondent's request and to exercise its discretion
3 whether to grant the request, or to take any other action deemed
4 appropriate and reasonable under the circumstances. Upon formal
5 acceptance of the tendered license, respondent will not longer be
6 subject to the terms and conditions of probation.

7 CONTINGENCY

8 This stipulation shall be subject to the approval of
9 the Division. Respondent understands and agrees that Board staff
10 and counsel for complainant may communicate directly with the
11 Division regarding this stipulation and settlement, without
12 notice to or participation by respondent or his counsel. If the
13 Division fails to adopt this stipulation as its Order, the
14 stipulation shall be of no force or effect, it shall be
15 inadmissible in any legal action between the parties, and the
16 Division shall not be disqualified from further action in this
17 matter by virtue of its consideration of this stipulation.

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ACCEPTANCE

I have read the above Stipulated Settlement and Disciplinary Order. I have fully discussed the terms and conditions and other matters contained therein with my attorney, Monty A. McIntyre. I understand the effect this Stipulated Settlement and Disciplinary Order will have on my Physician's and Surgeon's Certificate, and agree to be bound thereby. I enter this stipulation freely, knowingly, intelligently and voluntarily.

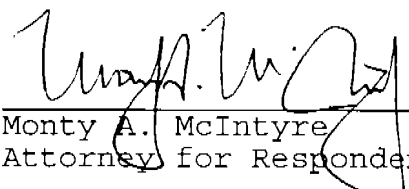
DATED: 4-4-96


LAWRENCE J. JAFFE
Respondent

I have read the above Stipulated Settlement and Disciplinary Order and approve of it as to form and content. I have fully discussed the terms and conditions and other matters therein with respondent Lawrence J. Jaffe.

McINTYRE & McINTYRE, A.P.C.

DATED: 4-4-96

By: 
Monty A. McIntyre
Attorney for Respondent

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ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for the consideration of the Division of Medical Quality, Medical Board of California, Department of Consumer Affairs.

DATED: May 9, 1996.

DANIEL E. LUNGREN, Attorney General
of the State of California

Richard D. Hendlin

RICHARD D. HENDLIN
Deputy Attorney General

Attorneys for Complainant

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EXHIBIT "A"

Attorneys for Complainant

Respondent.

1 said Physician's and Surgeon's Certificate was, and currently is,
2 in full force and effect.

3 JURISDICTION

4 3. This Accusation is made in reference to the
5 following statutes of the California Business and Professions
6 Code ("Code"):

7 A. Section 2227 provides that the Board may
8 revoke, suspend for a period not to exceed one year, or
9 place on probation, the license of any licensee who has been
10 found guilty under the Medical Practice Act.

11 B. Section 2234 provides that unprofessional
12 conduct includes, but is not limited to, the following:

13 "(b) Gross negligence.

14 "(c) Repeated negligent acts.

15 "(e) The commission of any act involving
16 dishonesty or corruption which is substantially related
17 to the qualifications, functions, or duties of a
18 physician and surgeon."

19 C. Section 2239 provides that the use or
20 prescribing for or administering to himself, of any
21 controlled substance; or the use of any of the dangerous
22 drugs specified in section 4211, or of alcoholic beverages,
23 to the extent, or in such a manner as to be dangerous or
24 injurious to the licensee, or to any other person or to the
25 public, or to the extent that such use impairs the ability
26 of the licensee to practice medicine safely, constitutes
27 unprofessional conduct.

1 D. Section 2242 provides that prescribing,
2 dispensing, or furnishing dangerous drugs as defined in
3 section 4211 without a good faith prior examination and
4 medical indication therefor, constitutes unprofessional
5 conduct.

6 E. Section 4211 provides that a "dangerous drug"
7 means any drug unsafe for self-medication including any drug
8 which by federal or state law can be lawfully dispensed only
9 on prescription.

10 F. Section 2261 provides that knowingly making
11 or signing any certificate or other document directly or
12 indirectly related to the practice of medicine or podiatry
13 which falsely represents the existence or nonexistence of a
14 state of facts, constitutes unprofessional conduct.

15 G. Section 2238 provides that a violation of any
16 federal statute or federal regulation or any of the statutes
17 or regulations of this state regulating dangerous drugs or
18 controlled substances constitutes unprofessional conduct.

19 H. Health and Safety Code section 11173 provides
20 that no person shall obtain or attempt to obtain controlled
21 substances, or procure or attempt to procure the
22 administration of or a prescription for controlled
23 substances, by fraud, deceit, misrepresentation, or
24 subterfuge, or by the concealment of a material fact. No
25 person shall make a false statement in any prescription,
26 order, report, or record, required by this division.
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1 Costs

2 4. Section 125.3 of the Business and Professions Code
3 provides that in any order issued in resolution of a disciplinary
4 proceeding before any board within the department, the board may
5 request the administrative law judge to direct a licentiate found
6 to have committed a violation or violations of the licensing act
7 to pay a sum not to exceed the reasonable costs of the
8 investigation and enforcement of the case.

9 FACTS

10 5. Patient Merry F.:

11 A. On or about November 20, 1993, patient Merry
12 F., filed a complaint with the Medical Board concerning
13 treatment she had received from respondent, a psychiatrist.
14 She had been a patient of respondent's from November of 1986
15 until July of 1993.

16 B. Merry F. stated in her complaint that on or
17 about October 20, 1992, following a therapy session with
18 respondent, he asked her to fill a prescription allegedly
19 for another person using her name. Respondent then drove
20 Merry F. to a pharmacy and gave her a prescription for 1 mg
21 of Klonopin with her name written on it. He also gave her
22 \$80 to purchase the drug and he waited outside the pharmacy
23 for Merry F. to return with the prescription. After
24 obtaining the prescription, she handed it to respondent and
25 he told her the Klonopin was really for one of his
26 employees.

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1 C. After Merry F. stopped seeing respondent in
2 July of 1993, she went back to the pharmacy that she had
3 gone to with respondent. She requested that the pharmacist
4 print out a computer generated list of all medications
5 filled there using her name. The pharmacy gave her a
6 computer print-out indicating that respondent had refilled
7 the Klonopin prescription five times using Merry F.'s name
8 and without her permission. The pharmacist told Merry F.
9 that respondent had picked up her prescriptions.

10 D. On or about May 19, 1992, respondent's
11 temporary clinical privileges were summarily suspended at
12 Charter Hospital-San Diego. This occurred because of
13 several staff reports of respondent coming to work at the
14 hospital with alcohol on his breath, on several occasions
15 between March 3, 1992, and May 1992. Furthermore, on May
16 19, 1992, respondent had a blood alcohol test which revealed
17 a blood alcohol level of between .4 - .5 at 10:15 a.m. at
18 the hospital.

19 E. From October 28, 1992, through March 11,
20 1993, respondent was afforded a Judicial Review Hearing to
21 contest the summary suspension. During the course of the
22 hearing, respondent had two of his then treating patients
23 testify for him on his behalf. One of these patients was
24 Merry F. The summary suspension was ultimately upheld by
25 the Appellate Review Executive Committee and the superior
26 court following a writ of mandate.

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1 F. On October 12, 1994, respondent and his
2 attorney, met with a medical consultant at the Medical Board
3 to discuss his loss of hospital privileges and Merry F.'s
4 complaint. Respondent denied that he had any problem with
5 alcohol, and stated that he was dealt with unfairly at
6 Charter Hospital.

7 G. Respondent admitted that he used Merry F.'s
8 name to write prescriptions for someone else. Respondent
9 also admitted that he had no formal medical chart for this
10 "other person." He further admitted that he frequently
11 picked up prescriptions for his patients because they are
12 "busy white collar and professional" patients who are "too
13 busy" to pick up their own prescriptions.

14 H. At the physician's conference, respondent was
15 asked to submit a urine sample. Respondent declined saying
16 that he had taken a Valium. He later told the Medical
17 Board's investigator that he had received the Valium from
18 his mother when he was visiting her a few months previously.

19 I. On October 19, 1994, an investigator for the
20 Medical Board went to respondent's home and requested a
21 urine sample. After talking to his attorney, respondent
22 submitted a sample.

23 J. The urine sample was positive for Marijuana
24 Metabolites and Benzodiazepine. Klonopin and Valium are
25 both Benzodiazepines. Respondent stated that he was taking
26 Valium even though he had not been prescribed Valium by
27 another physician.

1 6. Respondent has subjected his license to
2 disciplinary action under California Business and Professions
3 Code sections 2220, 2227 and 2234 on the grounds of
4 unprofessional conduct, as defined by sections 2234(b), and
5 2234(c) of the Code, in that he has committed gross negligence
6 and repeated negligent acts in the practice of his profession, as
7 more particularly alleged hereinafter:

8 A. Paragraph 5, above, is incorporated by
9 reference and realleged as if fully set forth herein.

10 B. Respondent is guilty of gross negligence and
11 repeated negligent acts in his care and treatment of patient
12 Merry F. Said acts include, but are not limited to, the
13 following:

14 (1) Respondent used Merry F. to fraudulently
15 obtain drugs for another person.

16 (2) Respondent took advantage of his
17 therapeutic relationship with Merry F. to obtain drugs
18 for his own purposes.

19 (3) Respondent took advantage of his
20 therapeutic relationship with Merry F. by having her
21 testify at his Judicial Review Hearing.

22 7. Respondent has further subjected his license to
23 disciplinary action under California Business and Professions
24 Code sections 2220, 2227 and 2234 on the grounds of
25 unprofessional conduct, as defined by sections 2234(e) of the
26 Code, in that he has committed acts involving dishonesty or
27 \ \ \

1 corruption which are substantially related to his qualifications,
2 functions, or duties as a physician, in the practice of his
3 profession, as more particularly alleged hereinafter:

4 A. Paragraph 5, above, is incorporated by
5 reference and realleged as if fully set forth herein.

6 B. Respondent is guilty of dishonesty and/or
7 corruption in his care and treatment of patient Merry F.
8 Said acts include, but are not limited to, the following:

9 (1) Respondent took advantage of his
10 therapeutic relationship with Merry F. to obtain drugs
11 for his own purposes.

12 (2) Respondent wrote a prescription using a
13 false name.

14 (3) Respondent refilled a prescription five
15 times using a false name.

16 8. Respondent has further subjected his license to
17 disciplinary action under California Business and Professions
18 Code sections 2220, 2227 and 2234 on the grounds of
19 unprofessional conduct, as defined by section 2239 of the Code,
20 in that he has used or administered to himself a controlled
21 substance, or any of the dangerous drugs specified in Section
22 4211, or of alcoholic beverages, to the extent, or in such a
23 manner as to be dangerous or injurious to the licensee, or to any
24 other person or to the public, or to the extent that such use
25 impaired the ability of the licensee to practice medicine safely,
26 as more particularly alleged hereinafter:

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1 A. Paragraph 5, above, is incorporated by
2 reference and realleged as if fully set forth herein.

3 B. Respondent self-administered Valium without
4 having been prescribed Valium by a treating physician; and

5 C. Respondent self-administered Marijuana.

6 9. Respondent has further subjected his license to
7 disciplinary action under California Business and Professions
8 Code sections 2220, 2227 and 2234 on the grounds of
9 unprofessional conduct, as defined by section 2261 of the Code,
10 in that he knowingly made or signed a certificate or other
11 document directly or indirectly related to the practice of
12 medicine which falsely represented the existence or nonexistence
13 of a state of facts, as more particularly alleged hereinafter:

14 A. Paragraph 5, above, is incorporated by
15 reference and realleged as if fully set forth herein.

16 B. Respondent falsely and fraudulently wrote a
17 prescription using a name other than that of the person for
18 whom intended.

19 C. Respondent refilled a prescription five times
20 using a false name.

21 10. Respondent has further subjected his license to
22 disciplinary action under California Business and Professions
23 Code sections 2220, 2227 and 2234 on the grounds of
24 unprofessional conduct, as defined by Health and Safety Code
25 section 11173, in that he obtained controlled substances, or
26 procured or attempted to procure the administration of or
27 prescription for controlled substances, by fraud, deceit,

1 misrepresentation, or subterfuge, or by the concealment of a
2 material fact. Further, respondent made a statement in a
3 prescription which falsely represented the existence or
4 nonexistence of a state of facts, as more particularly alleged
5 hereinafter:

6 A. Paragraph 5, above, is incorporated by
7 reference and realleged as if fully set forth herein.

8 B. Respondent falsely and fraudulently wrote a
9 prescription using a patient's name other than that of the
10 person for whom intended.

11 C. Respondent refilled a prescription five times
12 using a false name.

13 PRAYER

14 WHEREFORE, complainant requests that the Board hold a
15 hearing on the matters alleged herein, and that following said
16 hearing, the Board issue a decision:

17 1. Revoking or suspending Physician's and
18 Surgeon's Number A32274, heretofore issued to
19 respondent Lawrence J. Jaffe, M.D.;

20 2. Directing respondent Lawrence J. Jaffe, M.D.
21 to pay to the Board a reasonable sum for its
22 investigative and enforcement costs of this action; and

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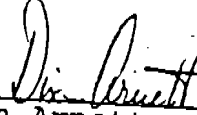
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2 3. Taking such other and further action as the
3 Board deems appropriate to protect the public health,
4 safety and welfare.

5 DATED: June 6, 1995

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9 Dixon Arnett
10 Executive Director
11 Medical Board of California
12 Department of Consumer Affairs
13 State of California

14 Complainant
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